



Stewardship Ontario



# **STAKEHOLDER AND INDIGENOUS PEOPLES ENGAGEMENT AND COMMUNICATIONS PLAN FOR THE DEVELOPMENT OF THE PROPOSED AMENDMENT TO THE BLUE BOX PROGRAM PLAN**

**Jointly Prepared by: Resource Productivity & Recovery Authority and  
Stewardship Ontario**

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## 1. Introduction

### 1.1 Plan Purpose and Scope

On August 14<sup>th</sup>, 2017 Ontario Minister of the Environment and Climate Change, Hon. Chris Ballard issued a letter directing the Resource Productivity and Recovery Authority (the Authority) and Stewardship Ontario to prepare an amended Blue Box Program Plan (a-BBPP) by February 15, 2018 that will transition the program from its current shared cost model to full producer responsibility, under the *Waste Diversion Transition Act, 2016* (WDTA). The Minister's direction letter requires that this work be done in consultation with stakeholders and Indigenous Peoples and further requests that the Authority and Stewardship Ontario jointly develop a communication and issues management plan to provide for meaningful consultation and communication with representatives of municipalities, Indigenous Peoples, stewards and other affected stakeholders. In this plan we will:

- Define roles and responsibilities for the Authority and Stewardship Ontario;
- Provide the principles by which the Authority and Stewardship Ontario will collaborate, engage and communicate with stakeholders and Indigenous Peoples;
- Identify stakeholders and Indigenous Peoples and their issues and concerns;
- Outline a plan to address stakeholder and Indigenous Peoples' issues and concerns; and
- Detail the processes, timing and activities that will take place to ensure that stakeholders and Indigenous Peoples have sufficient opportunities to meaningfully participate in the development of the amended Blue Box Plan.

As directed in the Minister's letter, the Authority and Stewardship Ontario have jointly developed this Stakeholder and Indigenous Peoples Engagement and Communications Plan, which includes a consultation strategy. In addition, the parties will submit a final report to the Ministry outlining how the Authority and Stewardship Ontario have met the consultation requirements under the WDTA. The final report will accompany the Proposal for an Amended Blue Box Program Plan. As per the Minister's direction to develop a joint proposal, each organization agrees to keep the other informed and apprised of all matters related to the development and execution of this plan.

To assist in carrying out our work, the roles and responsibilities of each organization are set out below.

#### 1.1.1 Stewardship Ontario

Stewardship Ontario will:

- Draft sections of the engagement plan and share them with the Authority for discussion and comment.
- Share draft versions of communications to stakeholders and Indigenous Peoples with the Authority for discussion and comment.
- Share draft versions of consultation materials with the Authority for discussion and comment.
- Execute the activities set out in this plan in coordination with the Authority.
- Provide comments received from stakeholders and Indigenous Peoples during the execution of this plan to the Authority.
- Keep the Authority apprised of status of consultations throughout the period this plan is being executed.



- Participate in regularly scheduled status update meetings with the Authority and MOECC staff.
- Establish the supporting communication and issue management processes to enable the development of a comprehensive Stakeholder and Indigenous Peoples Consultation Report.
- Facilitate team meetings with delegates from the Authority and Stewardship Ontario Program Plan development teams.

### 1.1.2 Resource Productivity and Recovery Authority

- The Authority will review draft documents submitted by Stewardship Ontario and provide comments and any suggested revisions.
- Provide comments received from stakeholders and Indigenous Peoples during the execution of this plan to Stewardship Ontario.
- Participate in and monitor stakeholder and Indigenous Peoples consultation activities
- Share with Stewardship Ontario any communications it intends to issue in the context of carrying out this plan.
- Participate in regularly scheduled status update meetings with Stewardship Ontario and MOECC staff.
- Prepare a revised draft Program Agreement for discussion and comment by Stewardship Ontario.

## 2. Background and Regulatory Context

The current Blue Box Program Plan (BBPP) was approved by the Minister of the Environment on December 22, 2003 pursuant to the *Waste Diversion Act, 2002 (WDA)* and has been in effect since February 1, 2004. The purpose of the original Plan was to achieve the following objectives under a *shared responsibility* model between producers and municipalities and First Nations communities:

- Divert 50% of residential printed paper and packaging by 2006<sup>1</sup>.
- Raise industry contributions to contribute 50% of the funds for municipal and First Nations communities recycling by levying companies who put printed paper and packaging into the Ontario marketplace.
- Ensure consumers adopt appropriate recycling behaviours consistent with their expectations for convenience and evolving perceptions of environmental stewardship and responsibility.

Since 2004, this partnership between stewards and municipalities and First Nations communities has diverted 11.2 million tonnes of material away from landfills to be repurposed in the manufacturing of new products and packaging, replacing virgin resources and greatly reducing greenhouse gas emissions. During this period, producers have contributed \$1.2 billion towards the costs incurred by municipalities and First Nations communities as a result of the program. The Plan has achieved a minimum 64% diversion rate since 2013.

After 14 years, the WDA was replaced by legislation that establishes a new vision based on Individual Producer Responsibility to contribute to a circular economy. On November 30, 2016, the *Waste Free*

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<sup>1</sup> This target later increased to 60% by 2008.



*Ontario Act, 2016* (WFOA) was proclaimed, ushering in new legislation which among other things, is designed to transition today's Blue Box Program from a shared-cost program, whereby producers pay 50% of costs incurred by municipalities and First Nations communities as a result of the program, to full producer responsibility, whereby producers will be fully responsible, both operationally and financially, for collecting and managing paper products and packaging (PPP).

The WFOA includes two pieces of legislation and several regulations (three of which are directed specifically at Stewardship Ontario):

- [\*Waste Diversion Transition Act, 2016\*](#) (WDTA): This Act is a restatement, with amendments, of selected sections of the WDA. The Act provides for the oversight of current stewardship programs until such time as they are wound up and producer obligations are transferred to the RRCEA. On August 14, 2017, the Minister of the Environment and Climate Change used s. 13 of this Act to request an amendment to the current BBPP providing for the first phase of a transition of the program from shared producer responsibility to full producer responsibility. Subsection 13(2) of the WDTA prescribes that the amended Plan be developed by the Authority and the industry funding organization through consultation with municipalities, stewards and affected stakeholders and Indigenous Peoples and Subsection 13(4) prescribes the Authority's approval of the proposed plan before it is submitted to the Minister for a final decision.
- [\*Resource Recovery and Circular Economy Act, 2016\*](#) (RRCEA): This Act comprises the core legislative features of the future-state of individual producer responsibility including the objectives of the legislation, how it is to be applied, the role and powers of the newly created *Resource Productivity and Recovery Authority* (the Authority) including its governance and enforcement powers, as well as the responsibilities of producers and service providers. This Act will govern the second phase of the transition from full producer responsibility under an amended Blue Box Program Plan administered by Stewardship Ontario to individual producer responsibility.
- [\*Ontario Regulation 386/16\*](#) (Blue Box Waste): Restates the prescribed Blue Box materials from the WDA as glass, metal, paper, plastic and textiles.
- [\*Ontario Regulation 387/16\*](#) (Municipal Hazardous or Special Waste, or MHSW): Prescribes MHSW wastes and restates the provisions of former Regulation 11/12 which prescribed the calculations to be used to assign costs to MHSW stewards on a quarterly basis. No matters related to MHSW are affected by the Minister's request for an a-BBPP.
- [\*Ontario Regulation 388/16\*](#) (Stewardship Ontario): Provides amendments to Stewardship Ontario's board composition and governance which were implemented in March 2017.

The above legislative package was accompanied by the [\*Strategy for a Waste-Free Ontario: Building the Circular Economy\*](#) which sets out a plan to shift Ontario to a circular economy.

Such a transition requires careful consideration to ensure there is no disruption to residential recycling services for consumers. The Strategy specifically calls out the Blue Box transition as having to be carefully considered and orchestrated due, among other things, to the fact that transition will impact municipalities and First Nations communities, commercial agreements and existing infrastructure. For producers, the transition process must ensure that operational control over recycling decisions is transferred along with the increased financial obligation. Specifically, the Strategy calls out a number of



issues to be considered during the consultation process, all of which are included in the Minister's request for an a-BBPP, including:

- *Improving program performance,*
- *Working towards a circular economy by supporting reduction, reuse, recycling and reintegration of PPP materials into the economy,*
- *Changing roles and responsibilities for the operation of the Blue Box system,*
- *Opportunities for municipal and First Nations communities' integrated waste management systems to support producer responsibility,*
- *How to address municipal and First Nations communities' contracts and assets, including existing contracts for collection and post-collection management and how to avoid "stranded" assets,*
- *Opportunities to expand and harmonize the list of materials collected across Ontario and the type of collection activities that are undertaken,*
- *Establishing clear and measurable collection and management standards with a high level of environmental protection,*
- *Developing methods to support waste reduction,*
- *Opportunities to lower overall costs through greater harmonization in the collection and post-collection management, and*
- *Promoting competition by ensuring a fair and open marketplace for Blue Box services under the WDTA and not creating barriers to competition when the program transitions to individual producer responsibility under the RRCEA.*

The Strategy sets out a projected timeline for achieving Blue Box transition as likely four to six years.

### 3. Stakeholder Identification

#### 3.1 Stakeholder Groups

This plan is directed at five primary groups; namely:

**Steward community** as the producers who are legally responsible under Stewardship Ontario's rules for stewards to pay fees to off-set the cost of end-of-life management of the paper products and packaging that they supply into the Ontario marketplace. The community of stewards obligated under the existing BBPP comprises approximately 1,500 companies. Under an a-BBPP this number is expected to increase somewhat due to the expanded definitions of obligated materials and producers. Besides the individual producers who are legally obligated, this stakeholder group also includes industry associations whose members collectively comprise the wide range of Stewardship Ontario stewards such as Retail Council of Canada (RCC), Food & Consumer Products of Canada (FCPC), Canadian Beverage Association (CBA), Canadian Newspapers Association, News Media Canada, Canadian Federation of Independent Grocers (CFIG), Canadian Consumer Specialty Products of Canada (CCSPA), Cosmetics Alliance Canada



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(formerly CCTFA), Neighbourhood Pharmacy Association of Canada (formerly CACDS) and others.

**Ontario local governments** as the municipalities that currently manage their individual printed paper and packaging collection and recycling programs and as potential future service providers. This group includes organizations that represent and speak for individual municipalities such as the Association of Municipalities of Ontario (AMO), Municipal Waste Association (MWA), City of Toronto, Regional Public Works Commissioners of Ontario and the Municipal Resource Recovery and Research Collaborative (Municipal 3Rs Collaborative).

**First Nations Communities**, some of which currently manage their own printed paper and packaging collection and recycling programs, some of which have partnered with neighbouring municipalities, as well as those communities that do not participate now but may be interested in doing so when an opportunity to do so is available.

**Waste Management Industry** as current subcontractors to local governments and as future collection subcontractors and post-collection processors of collected paper products and packaging as well as their trade association, Ontario Waste Management Association (OWMA).

**Environmental Non-Government Organizations (ENGOS)** with interest in seeing improved performance of the Blue Box Program such as Recycling Council of Ontario (RCO) and the Canadian Environmental Law Association (CELA) and others.

## 4. Stakeholder and Indigenous Peoples Engagement Approach

### 4.1 Engagement and Communications Principles

The following principles will guide the Authority and Stewardship Ontario's engagement and communications with its stakeholders and Indigenous Peoples and will be applied in both the development and implementation of this engagement and communications plan:

1. Engage and consult with stakeholders and Indigenous Peoples in a meaningful way.
2. Provide stakeholders and Indigenous Peoples with accurate, clear and timely information.
3. Be open, transparent and accountable in communications with stakeholders and Indigenous Peoples.
4. Regularly engage and consult with stakeholders and Indigenous Peoples on program related initiatives in a manner that builds trust and fosters two-way communication.

### 4.2 Engagement Commitment to Stakeholders and Indigenous Peoples

We are committed to collaborating with the steward community, municipalities, Indigenous Peoples and other stakeholders through meaningful engagement and consultations in a manner that builds trust, respects Aboriginal rights and treaty rights, and fosters two-way communication. We will ensure that information is communicated in a clear, consistent and timely manner, and that open and meaningful dialogue is encouraged and supported by opportunities for stakeholders' and Indigenous Peoples' ideas and concerns to be heard during development of the draft a-BBPP. All stakeholders' and Indigenous



Peoples' comments garnered during the development of the plan will be carefully considered to determine if and how they will be addressed as appropriate in the draft plan.

### 4.3 Objectives of Stakeholder and Indigenous Peoples' Engagement and Communications Plan

- Meet the Minister's request that the Authority and Stewardship Ontario develop a communications and issues management plan that:
  - Identifies issues that may arise during the development of a proposal for the a-BBPP and outline the steps to manage the issues identified,
  - Sets out the process by which the Authority and Stewardship Ontario will provide information to affected stakeholders, Indigenous Peoples and the public on a regular basis,
  - Ensures meaningful engagement, consultation and communication with representatives of municipalities, First Nations communities, stewards and other affected stakeholders,
  - Ensures accountability by describing how stakeholder and Indigenous Peoples engagement and consultation requirements under the WDTA will be met, and
  - Sets out the process by which stakeholders and Indigenous Peoples will be provided with opportunities to actively and meaningfully participate in the development of the a-BBPP and how their comments will be considered throughout that process.

### 4.4 Process and Timing

The final a-BBPP is due to the Minister of the Environment and Climate Change by February 15, 2018, allowing less than six months for plan development in consultation with stakeholders and Indigenous Peoples. The Authority and Stewardship Ontario are committed to conducting meaningful consultations and communications with all stakeholder groups and Indigenous Peoples to support a consultative approach. Engagement will be conducted in two phases.

### 4.5 Phase 1: Stakeholder and Indigenous Peoples Specific "Module" Consultation Approach and Schedule

Phase 1 will consist of a "modular" approach to consultation targeting the five stakeholder groups and Indigenous Peoples. The modules will be tailored to the role and interests of each stakeholder group and Indigenous Peoples, setting out the proposed features of the a-BBPP that impact stewards (e.g., the scope of who and what is obligated), local and First Nations governments (e.g., features of the 50/50 payment formula in pre-transition as well as the post-transition model and the method of transitioning), the waste management industry (e.g., the features of the service model) and environmental NGOs (e.g., contribution to diversion, collection service standards and continuity of service to residents). An overview of the features of the transition approach will preface each stakeholder-specific and Indigenous Peoples module.

Phase 1 consultations are scheduled to begin no later than October 2, 2017 and be completed by no later than November 17, 2017. They will consist of a combination of webinar and in-person meetings (more details are provided in the stakeholder-specific and Indigenous Peoples sections below). Webinars and meeting materials will be posted on the Authority and [Stewardship Ontario's website](#).



Based on the feedback from stakeholders and Indigenous Peoples, an a-BBPP will be developed and submitted to the boards of Stewardship Ontario and the Authority at their respective December meetings for approval in order to initiate Phase 2 of the consultation plan.

#### 4.6 Phase 2: Consultation on Draft Amended Blue Box Program Plan Approach and Schedule

Phase 2 of the consultation will consist of the Authority and Stewardship Ontario releasing the full draft of the a-BBPP proposal to all stakeholders and Indigenous Peoples by December 22<sup>nd</sup> for written comment by January 15<sup>th</sup>, 2018. To ensure the contents of the a-BBPP are well-understood, three webinars will be held during this comment period in early January (one tailored to stewards and the ENGO community; one tailored to municipalities and waste management companies; and a third tailored to First Nations communities). Participants will be invited to ask questions and submit comments within the established timelines. Stakeholders and Indigenous Peoples will be requested to provide written comments to the Authority and Stewardship Ontario by the deadline. Webinars and meeting materials will be posted on the Authority and Stewardship Ontario's websites to accommodate those stakeholders and First Nations communities unable to attend the webinars on the scheduled day.

Following the close of the comment period, Stewardship Ontario will finalize the a-BBPP proposal and the accompanying consultation report for approval by the Stewardship Ontario Board. The a-BBPP will then be submitted to the Authority for approval in late January 2018.

#### 4.7 Common Key Messages

To the extent possible, the consultations will be designed to address general issues, as well as issues specific to each stakeholder group and Indigenous Peoples, to ensure they are adequately addressed and that everyone has a chance to be heard on the matters that most concern them. However, there are certain key messages that will be incorporated into all consultations because they address matters common to all stakeholders and Indigenous Peoples, namely:

- The Minister of the Environment and Climate Change has directed the Authority and Stewardship Ontario to consult with stakeholders and Indigenous Peoples to develop an a-BBPP proposal.
- The Authority will, as directed by the Minister under S. 13 of the WDTA, ensure the a-BBPP proposal is developed in a consultative manner with stakeholders and Indigenous Peoples, and is consistent with the principles outlined in the Minister's letter of August 14, 2017 to the Authority and Stewardship Ontario and provincial interests outlined in S. 2 of the RRCEA.
- The transition from the current shared responsibility model to full producer responsibility will be conducted in a thoughtful, orderly and stepwise way that does not negatively affect residents' and Indigenous Peoples' experience with and access to Blue Box residential recycling services.
- The Authority and Stewardship Ontario seek feedback from stakeholders and Indigenous Peoples to ensure all relevant matters are considered in the development of an a-BBPP proposal.
- During the development of an a-BBPP, Stewardship Ontario will continue as an Industry Funding Organization (IFO) under the WDTA.
- If and when directed by the Minister, Stewardship Ontario will be wound up under the WDTA and stewards will be obligated under the RRCEA.



## 5. Engagement with Stewards

### 5.1 Background

Steward perspectives vary but all compliant stewards are interested in meeting their obligations in the most cost-efficient manner possible. Stewards have consistently advocated that if they are to be fully responsible for achieving circular economy outcomes they must also be fully self-determinant in how those outcomes are to be achieved. Many stewards are already incorporating circular economy thinking into their supply chains and are increasingly using recycled content as feedstock. Therefore, they would like to see increased environmental performance and have their packaging and paper collected consistently in all municipalities and First Nations communities across the province.

The Minister's request letter references the [accord](#) signed by Stewardship Ontario and municipal representatives, and expresses his expectation that the proposal for an a-BBPP will build on that accord. As described above, the accord expresses the desire of both municipalities and Stewardship Ontario board members for "an orderly and smooth transition of the Blue Box to EPR". The proposed process to gradually transition the Blue Box Program from shared responsibility to full producer responsibility will be shared with the steward community during the consultation meetings. The letter also contains requests that will be of specific interest to stewards, viz., an expanded scope of obligated materials, improved performance through a raised general diversion target of 75% and material-specific management targets; waste reduction strategies; extending recycling services to multi-family buildings on a proposed timeline and consideration for extending recycling services to public spaces; and the requirement for Stewardship Ontario and the newspaper publishing industry to reach agreement on an in-kind contribution in a manner that does not impose costs on transitioned municipalities. As described below, all of these requirements will be of interest to stewards because they will represent both additional costs as well as opportunities to increase performance.

### 5.2 Issues and Concerns

**Gradual Transition to Full Producer Responsibility:** Stewardship Ontario intends to assume full responsibility (financial and operational) in a gradual step-wise approach. It is proposed that as municipal and First Nations community contracts (for which costs are currently shared) expire over a period of approximately eight years<sup>2</sup>, Stewardship Ontario will assume full responsibility for delivering recycling services in each respective municipality and First Nations community. This approach, together with the implementation of a consistent set of service standards and a 'common basket of goods' is commensurate with the requirements in the Minister's letter. Stewards will want to understand how and when the financial implications of this transition will affect them. The consultation will set out, based on our current understanding of contract expiry and related costs for each municipality and First Nations community, how the financial implications of the transition will materialize.

**Level playing field:** Based on recent research conducted by Canadian Stewardship Services Alliance (CSSA), Stewardship Ontario's management services provider, the majority of the largest stewards say they are interested in fulfilling their compliance obligations through a not-for-profit collective that will deliver a level playing field. The Minister's letter and the accord with municipalities support this

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<sup>2</sup> Municipalities that represent approximately 80% of today's total net costs are expected to transition by the end of 2020.



approach for the first phase of transitioning from shared to full producer responsibility under the WDTA. This phase sets the stage for a subsequent transition to individual producer responsibility under the RRCEA.

**Harmonized Definitions of Obligated Paper Products and Packaging:** Stewards have asked for definitions of obligated materials that are harmonized with other provinces. The Minister’s letter requests that the definition of Blue Box materials be expanded to include paper products (e.g., paper sold as a product), as distinct from currently obligated *printed paper*. As well, it requires that primary, convenience and transport packaging as defined in the RRCEA also be obligated. While primary and convenience packaging are already obligated under the current program plan, transport packaging is not. Stewards may have questions about expanded definitions and whether they will be harmonized with other provinces and what the additional costs will be. The expanded scope of obligated materials will be a key component of the consultations with stewards and their trade associations.

**Program Performance:** The Minister’s letter specifies that Stewardship Ontario must achieve a 75% diversion target and must propose material-specific management targets as well. Many stewards, particularly those interested in improving the program’s performance as a source of increased feedstock for recycled content of products and packaging, will support the increased target, but will seek assurances that producer control of a fully transitioned program will help to offset the increased costs this target will represent. Stewards will also want to understand on what basis “material-specific management targets” will be established, how they will be calculated and how much time will be allotted to achieve them as increased performance targets may create additional cost to stewards, especially under the current circumstances of uncertain commodity markets.

**Waste Reduction:** The letter directs the Authority and Stewardship Ontario to develop strategies to discourage stewards’ use of problematic materials as well to increase products’ and packaging’s reusability and recyclability. Stewards will want to understand more about what this means and during consultations will be invited to provide suggestions of the kinds of strategies that should be included in its amended plan.

**Continuous Improvement:** The Authority and Stewardship Ontario have been asked to extend recycling services to multi-family buildings on a proposed timeline and consider extending recycling services to public spaces. Again, this expansion of program scope, while helpful in meeting targets, will have operational (e.g., material quality) and cost impacts.

**In-Kind Compensation for Newspaper Publishers:** The Minister’s letter directs the Authority and Stewardship Ontario to address issues related to the in-kind contributions from the newspaper industry in a manner that is without cost to the transitioned municipalities. Other producers are not likely to support the continuation of in-kind contributions because, in their view, it does not promote a level playing field. Stewardship Ontario will engage with the newspaper industry on this matter and include a proposed approach in its a-BBPP.

**De Minimis Thresholds:** The current de minimis thresholds for the Blue Box Program are as follows:

- 1) Stewards with revenues in Ontario of less than \$2 million/year do not need to file an annual report nor pay fees to Stewardship Ontario;
- 2) Stewards with gross sales over \$2 million but whose total reported packaging and printed paper quantities are less than 15,000 KG (15 tonnes) must report their materials to Stewardship Ontario but are exempt from paying fees.



The Minister's letter does not address de minimis. While de minimis thresholds are not popular with stewards because they are perceived to create a distorted playing field, de minimis provisions are common to all paper and packaging programs across the country. The Stewardship Ontario board will need to consider whether to retain the current de minimis thresholds in its a-BBPP when putting forward a proposed definition of obligated stewards.

**Program Cost Implications:** While many stewards support a gradual transition from shared to full producer responsibility, they will want to know as soon as possible, the order of magnitude of costs and when those costs will materialize during the transition process. During consultations with the steward community Stewardship Ontario will make every effort to provide this information, with the proviso that the estimates are preliminary and subject to change based on fluctuations in commodity markets, foreign exchange, and the uncertainties related to the transition of services from municipalities and First Nations communities to Stewardship Ontario and the outcome of future commercial tendering processes as well as changes to the expected timing of transition for individual municipalities and First Nations communities.

**Deposit Return Stewards:** In his letter, the Minister also requests that the Authority and Stewardship Ontario consult with stewards of packaging who are regulated under deposit-return programs, (e.g., stewards of milk containers). Members of the dairy industry have expressed an interest in managing their packaging to be regulated under the Waste Free Ontario Act in order to supply milk to consumers in natural HDPE jugs rather than plastic film bags. Stewardship Ontario and the Authority will ensure that the dairy industry is included in these consultations. The Ontario Dairy Council is included in the list of steward-related industry associations in Appendix A.

### 5.3 Engagement Objectives for Program Plan Development

The Authority and Stewardship Ontario will make every effort during consultations to ensure that stewards are informed about the requirements and direction in the Minister's letter, how the a-BBPP proposal can be designed to meet these requirements and how that design may affect them. Stewards will be given as much opportunity as time allows to provide suggestions and comments. Feedback will be carefully considered, recorded in the final consultation report to the Minister, and to the extent possible, incorporated into Stewardship Ontario's a-BBPP submitted to the Authority for approval.

### 5.4 Key Messages

Engagement with stewards will focus on matters of specific interest to them and accordingly will contain key messages designed to address those issues, such as:

- The Minister's direction provides a gradual transition from shared financial responsibility to full producer responsibility, the future stated contemplated in the RRCEA and Strategy;
- The gradual transition provides for an increase in producer self-determinacy (decision making rights) that is commensurate with an increase in financial responsibility;
- The transition to full producer responsibility will enable stewards to begin to take advantage of scale efficiencies in both logistics and material marketing;
- Province-wide planning and scale are effective ways to manage costs, meet consumer expectations and address the "evolving tonne";
- Municipalities support the gradual transition approach as evidenced by their recent signing of the accord; and
- The Authority and Stewardship Ontario need feedback from the steward community to ensure



all relevant matters are considered in the development of an a-BBPP.

## 5.5 Consultation Approach

The due date for a proposed a-BBPP is February 15, 2018, which provides limited opportunity for stakeholder engagement. However, the Authority and Stewardship Ontario intend to jointly conduct meaningful consultation and communication with all stakeholder groups and Indigenous Peoples, including stewards. Engagement will be conducted in two phases.

**Phase 1** will consist of a “modular” approach to consultation. The proposed features of a draft a-BBPP will be shared with stakeholders and Indigenous Peoples. An overview of the features of the gradual transition approach will precede the module.

The steward module will also include engagement with all relevant trade associations to ensure they are prepared to engage their members to explain the key features of the proposed a-BBPP. This consultation will be followed by a general meeting (in-person and via webinar) with all interested stewards during the afternoon of October 25. During the October/November consultation period, the Authority and Stewardship Ontario will also consult with the newspaper industry on the proposed in-kind contribution model under an a-BBPP.

Based on the feedback from stakeholders and Indigenous Peoples, a draft a-BBPP will be developed and submitted to the Stewardship Ontario board for approval to initiate Phase 2 of the consultations and separately to the Authority’s board.

**Phase 2** of the consultation will consist of the Authority and Stewardship Ontario releasing the draft a-BBPP proposal to all stakeholders and Indigenous Peoples by December 22 for their review. Webinars will be scheduled on January 8, 2018 when the plan will be reviewed and participants’ questions will be addressed. Stakeholders and Indigenous Peoples will be asked to provide final comments by no later than January 15 2018. The webinars and all meeting materials will be posted on the Authority and Stewardship Ontario’s websites. Following the close of the consultation period, the Authority and Stewardship Ontario will finalize the a-BBPP proposal and consultation report for Stewardship Ontario board approval in mid-January and submit to the Authority for approval in late January.

## 5.6 Communications Approach

Regular push notifications to stakeholders and Indigenous Peoples will be used to keep them updated on the process and status of program plan development, including industry associations, who in turn will be encouraged to share the information with their members. All consultation webinars, meeting materials, communiques, and Q&A documents will be posted on a dedicated section of the Authority and Stewardship Ontario’s websites.

## 5.7 Issues Management

The Authority and Stewardship Ontario will design specific modules to identify each group’s potential concerns and issues. During stakeholder and First Nations meetings we will check with participants that issues have been articulated accurately and comprehensively. We will invite stakeholders and Indigenous Peoples to provide their ideas on how those issues can/should be addressed, and to the extent possible these suggestions will be considered when drafting the a-BBPP proposal. All stakeholder



and Indigenous Peoples' concerns and issues will be documented in a final consultation report that will be submitted to the Authority and by the Authority to the Minister by the stipulated deadline.

## 6. Engagement with Municipalities

### 6.1 Background

The Minister's request letter requires that the proposal for the a-BBPP define eligible costs for non-transitioned municipalities and outline when and how the responsibility for the collection and management of paper product and packaging "will be transferred smoothly" from municipalities and First Nations communities to Stewardship Ontario.

The accord, jointly signed by municipal representatives and Stewardship Ontario, demonstrates common interests between the two groups. Municipalities share stewards' interest in a transition from shared responsibility to full producer responsibility in an orderly manner that does not disrupt service to their residents. Municipalities are keenly interested in how the transition will occur, including the definition of eligible costs for non-transitioned municipalities, the criteria, process and timing of transition and the service standards that will be utilized under an a-BBPP. They are also anxious to know how municipal recycling infrastructure assets will be treated post transition. The Minister's request letter requires that the proposal for the a-BBPP define eligible costs for non-transitioned municipalities and outline when and how the responsibility for the collection and management of paper product and packaging "will be transferred smoothly" from municipalities to Stewardship Ontario.

### 6.2 Issues and Concerns

**Eligible Costs and Payment for Non-Transitioned Municipalities:** For non-transitioned municipalities, Stewardship Ontario will make payments in accordance with S. 11 of the WDTA based on each community's verified net eligible costs to operate its existing Blue Box Program. Municipalities will want to know what will be considered eligible and ineligible costs and the process to follow to receive the steward contribution towards their eligible costs. As described below, proposed definitions of eligible and ineligible costs will be shared during Phase 1 of the consultation process.

**Integrated Waste Management Systems:** Municipalities will continue to provide their residents with garbage and organics management and will want to understand how transitioning responsibility for management of paper products and packaging to Stewardship Ontario will impact their existing systems and contracts. Stewardship Ontario will establish a forum in which details concerning how the transitioned system will operate and the nature of the commercial contracts that will govern its operation will be discussed with local governments. These discussions will be reflected in Phase 1 of the consultation process.

**Municipal Transition Process:** Municipalities will want to understand the conditions that must be met in order to transition from shared responsibility to full producer responsibility. Those municipalities that wish to continue to provide collection services under contract to Stewardship Ontario will want to know about the collection standards they will be asked to meet; the service contracts they will be asked to sign; and the standardized list of materials they will be asked to collect. To the extent that this information is available, it will be shared with local governments during Phase 1 of the consultation



process, and their feedback will be invited. Some elements, such as collection service agreements, will be developed following plan approval.

**Avoidance of Stranded Assets:** Municipalities do not want to be left with unproductive recycling infrastructure (referred to as stranded assets) as a result of the transition from shared to full producer responsibility. The Minister’s letter states that it is in the public interest that the proposal for an a-BBPP be consistent with the principle that stranded assets be avoided to the extent possible in a collaborative manner. Municipalities will be encouraged to share their views with Stewardship Ontario on how this can be achieved.

### 6.3 Engagement Objectives for Program Plan Development

Stewardship Ontario and the Authority will make every effort during consultations to ensure that municipalities are informed about the requirements and direction in the Minister’s letter, how the a-BBPP proposal can be designed to meet these requirements and how that design may affect them. Municipalities will be given as much opportunity as time allows to provide suggestions and comments. Feedback will be carefully considered, recorded in the final consultation report and to the extent possible, incorporated into Stewardship Ontario’s a-BBPP submitted to the Authority for approval.

### 6.4 Key Messages

- Stewardship Ontario will promote a fair and open marketplace for procurement for both collection and post-collection management. Stewardship Ontario will be non-discriminatory in its procurement processes.
- During and after the development of the a-BBPP, as much information as possible will be provided in as timely a fashion as possible to minimize uncertainty and to enable municipalities and indigenous communities to make informed planning decisions in preparation for transition.
- Through the consultation process and the new forum, Stewardship Ontario will rely on local governments’ expertise and seek opportunities to collaborate with them.
- The Authority and Stewardship Ontario need feedback from municipalities and First Nations communities to ensure all relevant matters are considered under the a-BBPP.

### 6.5 Consultation Approach

Stewardship Ontario and the Authority intend to conduct meaningful consultations with municipalities in two phases.

**Phase 1** will consist of a modular approach to consultation wherein the proposed components of the a-BBPP that impact municipalities will be discussed. The material will be presented in two distinct modules in October:

- 1) **Module 1** will outline the features of the program plan that address the transition process for collection and post-collection. It will address how payments will be calculated for non-transitioned municipalities (e.g., eligible sources of paper products and packaging, eligible costs and revenue, municipal reporting, and data verification); as well as the process by which the responsibility for management of paper products and packaging will transition from municipalities to Stewardship Ontario; and the design features of the transitioned recycling supply chain.

- 2) **Module 2** will focus on performance requirements of the transitioned recycling system, as they pertain to transitioned municipalities as collection service providers to Stewardship Ontario. Topics addressed in Module 2 will include materials to be collected, collection standards, collection performance and measurement protocols.

In addition to webinars, a series of in-person consultations will be held throughout the province. Tentative plans include the following locations between October and November:

- o Southwestern Ontario – London,
- o Greater Toronto Hamilton Area – Peel Region,
- o Eastern Ontario – Smiths Falls,
- o Central Ontario – Bracebridge or Huntsville,
- o Northwestern Ontario – Dryden or Thunder Bay, and
- o Northeastern Ontario – North Bay or Sudbury.

**Phase 2** of the consultation will consist of the Authority and Stewardship Ontario releasing the draft proposal for an a-BBPP to all stakeholders and Indigenous Peoples by December 22 for their review. A webinar directed to municipalities and the private waste management industry will be held on January 8, 2018 when the key features of the plan will be reviewed and participants' questions will be addressed. Municipal and private waste management stakeholders and their associations will be asked to provide final comments by no later than January 15, 2018. The webinar and all meeting materials will be posted on Stewardship Ontario's website. Following the close of the consultation period, Stewardship Ontario will finalize the a-BBPP and consultation report for Stewardship Ontario board approval the week of January 22 and submit to the Authority for approval in late January.

It is anticipated that municipal stakeholders may request information that will not be available during a-BBPP development. Stewardship Ontario will establish a forum in which these questions concerning how the transitioned system will operate and the nature of the commercial contracts that will govern its operation will be identified and discussed with municipal stakeholders and Indigenous Peoples. It is expected that this forum will continue to meet beyond the February 15, 2018 a-BBPP submission deadline and, if the proposal for an a-BBPP is approved, during the implementation period.

## 6.6 Communications Approach

Regular push notifications to municipalities will be used to keep them updated on the process and status of program plan development, via Dave Gordon, the lead on AMO's Municipal Resource Recovery and Research Collaborative (Municipal 3Rs Collaboration), which will serve as the communications hub for all notifications directed at municipalities. In addition, all formal communications will be posted on Stewardship Ontario's website.

All consultation webinars, meeting materials, communiques, and Q&A documents will be posted on a dedicated section of Stewardship Ontario's website.

## 6.7 Issues Management

The Authority and Stewardship Ontario will design stakeholder-specific and Indigenous Peoples modules to identify each group's potential concerns and issues. During stakeholder and Indigenous Peoples



meetings we will check with participants that issues have been articulated accurately and comprehensively. We will invite stakeholders and Indigenous Peoples to provide their ideas on how those issues can/should be addressed, and to the extent possible these suggestions will be considered when drafting the a-BBPP. Stakeholders and Indigenous Peoples will be requested to submit questions posed during meetings and they will be invited to submit comments, questions and feedback anytime via a “feedback button” available on Stewardship Ontario’s website. All stakeholder concerns and issues will be documented in a final consultation report that will be submitted to the Authority and by the Authority to the Minister by the stipulated deadline.

In addition, as described above, Stewardship Ontario will establish a forum in which details concerning how the transitioned system will operate and the nature of the commercial contracts that will govern its operation will be identified and discussed with local governments. It is expected that this forum will continue to meet beyond the February 15, 2018 a-BBPP submission deadline and, if the proposal for an amended BBPP is approved, during the implementation period.

## 7. Engagement with Indigenous Peoples

### 7.1 Background

Currently, 21 First Nations communities report into the Datacall and a smaller number report their Blue Box materials under the umbrella of a neighbouring municipality. Some First Nations communities operate waste diversion programs independently outside the Blue Box Program and do not report the quantities of printed paper and packaging managed or associated costs and revenues to the Datacall. Others have expressed an interest in establishing a Blue Box Program.

As participants in the Blue Box Program, operators of waste diversion programs and interested parties to an amended Blue Box Program, Ontario’s Indigenous Peoples are an important group with which Stewardship Ontario and the Authority will seek to engage during development of the a-BBPP.

As Stewardship Ontario develops a proposed a-BBPP, First Nations communities currently participating in the Blue Box Program will want to understand how eligible costs for non-transitioned communities will be defined and when and how the responsibility for the collection and management of paper products and packaging “will be transferred smoothly” from First Nations communities or their partner municipalities to Stewardship Ontario.

Participating First Nations communities also share municipalities’ and stewards’ interest in an orderly transition from shared responsibility to full producer responsibility in a manner that does not disrupt service to their communities, as well as understanding the criteria, process and timing of transition and the service standards that will be utilized under an a-BBPP. They will also want to know how recycling infrastructure assets will be treated post-transition.

For those First Nations communities that currently do not participate in the Blue Box Program, an a-BBPP provides an opportunity to assess whether to participate in the program in the future within the context of the Minister’s request that the a-BBPP “consider expanding Blue Box collection services over time”. Stewardship Ontario and the Authority will engage with these First Nations communities interested in exploring opportunities to participate in an a-BBPP to determine how it will affect their communities, and jointly with them, develop an engagement plan that promotes mutual respect and meaningful, timely engagements.



## 7.2. Engagement Approach

Stewardship Ontario will engage with First Nations communities to develop the most appropriate engagement approach.

**Identifying Appropriate First Nations Representatives:** Stewardship Ontario will first engage with First Nations communities, leaders and/or representative associations such as the Ontario First Nations Technical Services Corporation and the Chiefs of Ontario to seek guidance on identifying the most appropriate representatives to work with on the development of an engagement plan.

**Developing a First Nations Engagement Plan:** Stewardship Ontario will work with the most appropriate First Nations representatives, leaders and/or communities to develop an engagement plan that reflects the needs of First Nations communities, including how the engagements should be organized, what information is required to support the engagements, and how information should be communicated and to whom. In addition to webinars, a series of in-person meetings are being proposed between October and November in the following regions in parallel with the engagement approach for municipalities:

- o Southwestern Ontario – London,
- o Greater Toronto Hamilton Area – Peel Region,
- o Eastern Ontario – Smiths Falls,
- o Central Ontario – Bracebridge or Huntsville,
- o Northwestern Ontario – Dryden or Thunder Bay, and
- o Northeastern Ontario – North Bay or Sudbury.

Based on the submission deadline outlined in the Minister’s direction letter, the Authority and Stewardship Ontario anticipate the draft proposal for an a-BBPP will be shared with all stakeholders and Indigenous Peoples by December 22 for their review. A webinar and/or in person meeting with First Nations communities is being proposed for early January when the key features of the plan will be reviewed and participants’ questions will be addressed. First Nations communities will be asked to provide final comments by no later than January 15, 2018 in order to meet the Minister’s deadline. The materials will be posted on Stewardship Ontario’s website or distributed through communication channels identified by First Nations communities. Following the close of the engagement period, Stewardship Ontario will finalize the a-BBPP and consultation report for Stewardship Ontario board approval the week of January 22 and submit to the Authority for approval in late January.

It is anticipated that Indigenous Peoples may request information that will not be available during a-BBPP development. Stewardship Ontario will establish a forum in which these questions concerning how the transitioned system will operate and the nature of the commercial contracts that will govern its operation will be identified and discussed with Indigenous Peoples. It is expected that this forum will continue to meet beyond the February 15, 2018 a-BBPP submission deadline and, if the proposal for an a-BBPP is approved, during the implementation period.

## 7.3 Issues and Concerns

Through the development of the engagement approach with Indigenous Peoples, a comprehensive list of issues and concerns will be identified. In the meantime, the following preliminary issues and concerns have been identified.



**Eligible Costs and Payment for Non-Transitioned First Nations Communities:** For non-transitioned First Nations communities, or those municipalities providing services on behalf of First Nations communities, Stewardship Ontario will make payments in accordance with S. 11 of the WDTA based on each community's verified net eligible costs to operate its existing Blue Box Program. Participating First Nations communities will want to know what will be considered eligible and ineligible costs and the process to follow to receive the steward contribution towards their eligible costs. Proposed definitions of eligible and ineligible costs will be shared during the engagement process.

**Integrated Waste Management Systems:** Those participating First Nations communities will continue to provide their residents with garbage collection and, in some instances, organics management services and will want to understand how transitioning responsibility for paper products and packaging to Stewardship Ontario will impact their existing systems and contracts. Stewardship Ontario will establish a forum in which details concerning how the transitioned system will operate and the nature of the commercial contracts that will govern its operation will be discussed with local governments and First Nations communities. These discussions will be reflected during the engagement process.

**First Nations Communities Transition Process:** First Nations communities will want to understand the conditions that must be met to transition from shared responsibility to full producer responsibility. Those First Nation communities that wish to continue to provide collection services under contract to Stewardship Ontario will want to know about the collection standards they will be asked to meet; the service contracts they will be asked to sign; and the standardized list of materials they will be asked to collect. To the extent that this information is available, it will be shared with First Nations communities during Phase 1 of the engagement process, and their feedback will be invited. Some elements, such as collection service agreements, will be developed following plan approval.

## 7.4 Engagement Objectives for Program Plan Development

Stewardship Ontario and the Authority will make every effort to ensure that Indigenous Peoples are informed about the requirements and direction in the Minister's letter and engaged on how the a-BBPP proposal can be designed to meet these requirements and how that design may affect them. First Nations communities will be given as much opportunity as time allows to provide suggestions and comments. Feedback will be carefully considered, recorded in the final consultation report and to the extent possible, incorporated into Stewardship Ontario's a-BBPP submitted to the Authority for approval.

## 7.5 Key Messages

- The Authority and Stewardship Ontario are seeking to engage with Indigenous Peoples to ensure their perspectives are considered in the development of the a-BBPP.
- The Authority and Stewardship Ontario will engage with First Nations communities and representatives and share information in a timely fashion to minimize uncertainty and to enable First Nations communities to make informed planning decisions in preparation for transition or to join the Blue Box Program.
- Through the engagement process, Stewardship Ontario will rely on First Nations communities' expertise and seek opportunities to collaborate with them.



- Stewardship Ontario will promote a fair and open marketplace for procurement for both collection and post-collection management. Stewardship Ontario will be non-discriminatory in its procurement processes.

## 8. Engagement with the Waste Management Industry

### 8.1 Background

As municipalities and First Nations communities transition from shared responsibility to full producer responsibility and Stewardship Ontario assumes responsibility for collection and management of residential paper products and packaging, the waste management industry will contract directly with Stewardship Ontario through an open procurement process for post-collection services. Where a transitioned municipality or First Nations community no longer wishes to provide collection services (either directly or through a subcontractor), the waste management industry will contract directly with Stewardship Ontario through an open procurement process for collection services.

### 8.2 Issues and Concerns

**Fair competition:** Companies in the waste management sector are interested in a fair and equal opportunity to compete to provide services. Stewardship Ontario intends to promote a fair and open marketplace.

**Predictability:** Waste management companies will seek as much information as possible as early as possible to assist them in making informed planning and investment decisions.

**Contract terms:** Waste management companies will want information about future contract terms including, but not limited to allocation of commodity market risk and reporting requirements so that Stewardship Ontario has the data necessary to report performance against recycling and material specific targets.

### 8.3 Engagement Objectives for Program Plan Development

Stewardship Ontario and the Authority will make every effort during consultations to ensure that the waste management industry is informed about the requirements and direction in the Minister's letter how the a-BBPP proposal can be designed to meet these requirements and how that design may affect them. Waste management companies will be given as much opportunity as time allows to provide suggestions and comments. Feedback will be carefully considered, recorded in the final consultation report to the Minister, and to the extent possible, incorporated into Stewardship Ontario's a-BBPP submitted to the Authority for approval.

### 8.4 Key Messages

- The Authority and Stewardship Ontario will promote a fair and open marketplace for procurement of paper products and packaging recycling services where Stewardship Ontario is procuring collection and post-collection services. Stewardship Ontario will be non-discriminatory in its procurement processes.



- During and after the development of the a-BBPP, as much information will be provided as possible in as timely a fashion as possible to minimize uncertainty and to enable the waste management companies to make informed planning and investment decisions.
- Through the consultation process and the new forum, Stewardship Ontario will rely on the expertise of waste management companies and will seek opportunities to collaborate with them.
- The Authority and Stewardship Ontario needs feedback from the waste management industry to ensure all relevant matters are considered under the a-BBPP.

## 8.5 Consultation Approach

As with the other stakeholder groups, consultation with the waste management industry will consist of two phases.

**Phase 1** will use a modular approach wherein the proposed components of the a-BBPP that impact waste companies will be discussed with them in various meetings organized in collaboration with OWMA held during the period from September to mid-November. The module will focus on the design features of the transitioned recycling supply chain that are of most interest to industry members.

**Phase 2** of the consultation will consist of Stewardship Ontario and the Authority releasing the draft proposal for an a-BBPP to all stakeholders and Indigenous Peoples no later by December 22 for their review. A webinar directed to municipalities and the private waste management industry will be held on January 8, 2018 when the key features of the plan will be reviewed and participants' questions will be addressed. Municipal and private waste management stakeholders and their associations will be asked to provide final comments by no later than January 15, 2018. The webinar and all meeting materials will be posted on Stewardship Ontario's website. Following the close of the consultation period, Stewardship Ontario will finalize the a-BBPP and consultation report for Stewardship Ontario board approval the week of January 22 and submit to the Authority for approval in late January.

## 8.6 Communications Approach

Regular push notifications to waste management businesses will be used to keep them updated on the process and status of program plan development, via Rob Cook at OWMA. All consultation webinars, meeting materials, communiques, and Q&A documents will be posted on a dedicated section of Stewardship Ontario's website.

## 8.7 Issues Management

Stewardship Ontario and the Authority will design stakeholder-specific modules to identify each group's potential concerns and issues. During the stakeholder and Indigenous Peoples meetings we will check with participants that issues have been articulated accurately and comprehensively. We will invite stakeholders and Indigenous Peoples to provide their ideas on how those issues can/should be addressed, and to the extent possible these suggestions will be considered when drafting the a-BBPP. Stakeholders and Indigenous Peoples will be requested to submit responses to specific questions posed during meetings and they will be invited to submit comments, questions and feedback anytime via a "feedback button" available on Stewardship Ontario's website. All stakeholder concerns and issues will



be documented in a final consultation report that will be submitted to the Authority and by the Authority to the Minister by the stipulated deadline.

In addition, as described above, Stewardship Ontario will establish a forum in which details concerning how the transitioned system will operate and the nature of the commercial contracts that will govern its operation will be identified and discussed with waste management companies. It is expected that this forum will continue to meet beyond the February 15, 2018 a-BBPP submission deadline, and, if the proposal for an amended BBPP is approved, during the implementation period.

## 9. Engagement with ENGOs and Other Stakeholders

### 9.1 Background

Stewardship and the Authority will engage with ENGOs with an interest in the Blue Box Program, such as the Recycling Council of Ontario (RCO), the Toronto Environmental Alliance, the Canadian Environmental Law Association (CELA) and others, including the Ontario Environmental Network and its members.

We will also ensure that organizations with interests in packaging materials such as Paper and Paperboard Packaging and Environmental Council (PPEC), the Canadian Plastics Industry Association (CPIA), Carton Council, and PAC are invited to participate in the consultation.

### 9.2 Issues and Concerns

Recent initial conversations with ENGOs and other stakeholders indicate that they will want to understand how the a-BBPP will:

- Increase diversion of paper products and packaging;
- Reduce the quantity of paper products and packaging supplied by stewards that is not measurably contributing to the circular economy;
- Ensure that energy-from-waste is not considered as waste diversion;
- Promotion of a circular economy and best use of recovered resources;
- Reduce greenhouse gases;
- Set materials specific targets and report on progress towards their achievement;
- Discourage producers from using difficult-to-recycle materials and materials that may pose a hazard to human health or the environment; and
- Address the challenge of collecting material from multi-family residences.

We anticipate that the packaging materials industry will want to understand how the a-BBPP will:

- Increase diversion of their paper products and packaging;
- Affect demand by producers for their paper products and packages; and
- Lead to expectations by producers for changes in design of their products and packages.

### 9.3 Engagement Objectives for Program Plan Development

Stewardship Ontario and the Authority will engage with these organizations when the draft amended program plan is released for stakeholder consultation in December, 2017 during Phase 2 of the consultation process referenced above.



## 9.4 Key Messages

Engagement with ENGOs and other stakeholders will include key messages designed to address the matters of special interest to them. For example:

- Stewardship Ontario will promote a fair and open marketplace for procurement of collection and processing services for transitioned jurisdiction.
- The a-BBPP will be designed to increase system performance, in accordance with the Minister's letter, in a variety of ways including an expanded scope of obligated materials, improved performance through a raised general diversion target of 75% and material-specific management targets; waste reduction strategies; extended recycling services to multi-family buildings on a proposed timeline and consideration for extending recycling services to public spaces.
- The methods for managing the materials collected do not count energy from waste (EfW) as a form of diversion.

## 9.5 Consultation Approach

Meetings with ENGOs and other stakeholders will be arranged to discuss their concerns and to solicit their input. They will also be invited to review all consultation documents posted on Stewardship Ontario's website in the coming months. In addition, Stewardship Ontario and the Authority will release the draft proposal for an a-BBPP to all stakeholders and Indigenous Peoples no later than by December 22 for their review. Notification of its posting will be sent to all stakeholders and they will be invited to provide their comments on the a-BBPP to Stewardship Ontario in early January. A dedicated feedback form on Stewardship Ontario's website is designed to also encourage feedback from stakeholders.

## 9.6 Communications Approach

Regular push notifications to ENGOs and other stakeholders will be used to keep them updated on the process and status of program plan development. All consultation webinars, meeting materials, communiques and Q&A documents will be posted on a dedicated section of Stewardship Ontario's website.

## 9.7 Issues Management

Consultation documents will be designed to acknowledge and address issues raised by ENGOs and other stakeholders and their feedback solicited.

# 10. Conclusion and Next Steps

Throughout the next six months, Stewardship Ontario and the Authority are committed to engaging in meaningful consultation and communication with the steward community, municipalities, Indigenous Peoples, the waste management industry, ENGOs and other stakeholders on the proposal to amend the Blue Box Program Plan in a manner that fosters open dialogue. Preparations for meetings are already underway.



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All materials from meetings will be posted on a dedicated section of Stewardship Ontario’s website [here](#). Stakeholders and Indigenous Peoples will be requested to submit responses to specific questions posed during meetings and they will be invited to submit comments, questions and feedback any time via a “feedback button” [available on Stewardship Ontario’s website](#). All feedback will be carefully documented in a final consultation report to be submitted along with the proposed a-BBPP first to the Authority, and then by the Authority to the Minister by February 15, 2018.



## Appendix A – Steward Industry Associations

Steward Industry Associations	
1.	Association of Home Appliance Manufacturers (AHAM)
2.	Automotive Industries Association of Canada
3.	Canadian Bankers Association
4.	Canadian Beverage Association
5.	Canadian Consumer Specialty Products Association (CCSPA)
6.	Canadian Federation of Independent Grocers (CFIG)
7.	Canadian Hardware & Housewares Manufacturers Association (CHHMA)
8.	News Media Canada
9.	Canadian Paint and Coating Association
10.	Canadian Produce Marketing Association (CPMA)
11.	Canadian Vehicle Manufacturers' Association (CVMA)
12.	Cosmetics Alliance Canada
13.	Croplife
14.	Electro-Federation Canada
15.	Electronics Product Stewardship Canada (EPSC)



Stewardship Ontario

**RPRA**  
Resource Productivity  
& Recovery Authority



**OPRR**  
Office de la productivité et de  
la récupération des ressources

Steward Industry Associations	
16.	Food & Consumer Products of Canada (FCPC)
17.	Global Automakers of Canada
18.	Magazines Canada
19.	Neighbourhood Pharmacy Association of Canada
20.	Ontario Dairy Council
21.	Retail Council of Canada (RCC)
22.	Restaurants Canada



## Appendix B Municipal Representatives

<b>Municipalities</b>	
1.	Association of Municipalities of Ontario (AMO)
2.	Municipal Resource Recovery and Research Collaborative (Municipal 3Rs Collaborative)
3.	Regional Public Works Commissioners of Ontario (RPWCO): Representing municipalities serving over 80% of Ontario’s population. (Greater Sudbury, County of Simcoe, Haldimand, Halton, Hamilton, London, Niagara, Ottawa, Peel, Durham, Muskoka, Thunder Bay, Toronto, Waterloo Windsor, York)
4.	Municipal Waste Association (MWA) (formerly the Association of Municipal Recycling Coordinators)



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## Appendix C Indigenous Community Organizations

Indigenous Community Organizations	
1.	Ontario First Nations Technical Services Corporation (OFNTSC)
2.	Chiefs of Ontario



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## Appendix D Waste Management Industry Associations

Waste Management Industry Representatives	
1.	Ontario Waste Management Association (OWMA)
2.	Ontario Environmental Industry Association



## Appendix E ENGOs and Other Stakeholder Organizations

### ENGOs

1.	Recycling Council of Ontario (RCO)
2.	Ontario Environmental Industry Association (ONEIA)
3.	Toronto Environmental Alliance
4.	Canadian Environmental Law Association (CELA)
5.	Ontario Environmental Network

### Other Stakeholder Organizations

1.	Paper and Paperboard Packaging and Environmental Council (PPEC)
2.	Canadian Plastics Industry Association (CPIA)
3.	Carton Council
4.	Packaging Consortium (PAC)